

Comments Opposing Lifting Symbol Rate Restrictions on HF Digital Emissions –
Reference FCC Docket 17-344

Dear sirs/madams;

I am vehemently opposed to lifting symbol rate restrictions on data emissions in the U.S. Amateur Radio Service which would allow even more interference by PACTOR and Winlink transmissions via ACDS (Automatically Controlled Digital Systems) that already begin transmissions on top of existing conversations with no regard to whether the frequency is already occupied by others or not! Lifting the existing symbols rate restrictions will only result in more and worse interference because signals would be able to occupy an unlimited bandwidth with their transmissions! Also, the ARRL (American Radio Relay League) is now supporting taking away a portion of the 75 meter phone band reserved for those that hold an Amateur Extra Class license and allotting 75 Khz of that to digital transmissions. I have held an Extra Class license since April 19, 1997 and worked very hard to earn the right to operate in this portion of the band by taking and passing 5 written technical examinations and 3 Morse code exams and feel this unfair to others who have also earned this privilege through the FCC's incentive licensing program. If symbol rate restrictions are to be lifted then additional frequencies need to be made available for these type transmissions without taking away the frequencies or privileges of others that have earned them or making them have to put up with further and worse interference than they do already by ACDS transmissions. For this reason alone I vehemently oppose lifting symbol rate restrictions on digital transmissions in the U.S. Amateur Radio Service bands. Also, in response to the claim made by the Amateur Radio Safety Foundation, Inc to Steven C. Wuelfing, K8BZ of Gladwin, MI, ID: 10131214946899 I served as an ARRL appointed Official Observer for the Amateur Auxiliary to the FCC from August 6, 2008 until I resigned my appointment on January 2, 2018 and have witnessed numerous occasions in my many hours of monitoring of ACDS transmissions covering up ongoing conversations by beginning transmissions on top of others with no regard that the frequency was already in use and although the 300 bps baud rate may not make the signal bandwidths wider as they currently exist if these symbol rates restrictions are lifted it's a sure bet that baud rates and the resulting bandwidths will increase so the technical points made by the Amateur Radio Safety Foundation, Inc reply to Steven C. Wuelfing, K8BZ of Gladwin, MI, ID: 10131214946899 are invalid.

My very best regards!

Floyd C. Fox

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